RENE L. VALLADARES
Federal Public Defender
Nevada State Bar No. 11479
MADELINE S. LAL
Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
(702) 388-6577/Phone
(702) 388-6261/Fax
Madeline\_Lal@fd.org

Attorney for Kareen Anderson

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

United States of America,

Plaintiff,

v.

Kareen Anderson,

Defendant.

Case No. 2:16-cr-00305-KJD-VCF

Joint Stipulation Regarding a Reduction in Sentence

In compliance with Amended General Order 2023-09, the parties, Jason M. Frierson, United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Madeline S. Lal, Assistant Federal Public Defender, counsel for Kareen Anderson, file this Joint Stipulation.

The parties state as follows:

1. Undersigned counsel and government counsel have determined that Mr. Anderson qualifies for a sentence reduction under United States Sentencing Guidelines Amendment 821 and have reached an agreement regarding a proposed sentencing reduction.

- 2. Defense counsel has spoken to the defendant. The defendant consents to the proposed sentencing reduction detailed below. The defendant waives any right to appear telephonically or in person at a hearing, should this Court find a hearing is necessary.
- 3. On February 5, 2020, this Court sentenced Mr. Anderson to 121 months' incarceration. ECF No. 295. Mr. Anderson was in CHC I with a total offense level of 32, which yielded a sentencing guideline range of 121–151 months. Under the amended Guidelines, the parties have determined Mr. Anderson is in CHC I with a total offense level of 30 which yields a guideline range of 120 months.<sup>1</sup>
- 4. Consistent with U.S.S.G. § 1B1.10, the parties are proposing Mr. Anderson's sentence be amended to 120 months.

DATED this 20th day of February, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By <u>/s/ Madeline S. Lal</u>

MADELINE S. LAL
Assistant Federal Public Defender

By <u>/s/ Jim W. Fang</u>

JIM W. FANG
Assistant United States Attorney

<sup>&</sup>lt;sup>1</sup> Mr. Anderson's count of conviction carries a mandatory minimum of 120 months.

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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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## **ORDER**

The Court has considered the parties' proposed resolution and the factors set out in 18 U.S.C. § 3553(a) and under U.S.S.G. § 1B1.10.

IT IS THEREFORE ORDERED that the parties' proposed amended sentence is accepted. Pursuant to Amended General Order 2023-09, an AO247 form reflecting the amended sentence will be filed.

DATED this 20 day of February, 2024.

UNITED STATES DISTRICT JUDGE